

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
DETROIT**

CH. 11

Case No. 21-47210

Hon. Maria L. Oxholm

In re:

Saline Lodging Group, LLC,
Debtor.

_____ /

**MODIFICATION OF PLAN AND DISCLOSURE STATEMENT
OF CREDITOR YOUR ENTERPRISE SOLUTIONS, LLC**

I. Introduction

Creditor, Your Enterprise Solutions, LLC (“YES”), filed its Liquidating Combined Plan and Disclosure Statement (the “Plan and Disclosure Statement” or the “Plan”) on June 7, 2022 (Dkt. #183). By an order dated June 16, 2022, this Court preliminarily approved the Disclosure Statement contained therein (Dkt. #188). YES hereby proposes the following modification to its Plan and Disclosure Statement pursuant to 11 USC §1127 and Bankruptcy Rule 3019(a).

II. Definitions

Scope of Definitions. For purposes of this Modification, except as expressly otherwise provided or unless the context otherwise requires, all capitalized terms not otherwise defined shall have the meanings assigned to them in the Plan.

III. Disclosure

On July 14, 2022, YES purchased and was assigned the Class 3 construction lien claim of Tri-County Electric Company of Washtenaw County (Tri-County), the holder

of Claim #5 filed January 5, 2022. On July 15, 2022, Adversary Proceeding 22-4037-MLO between YES and Tri-County related thereto was dismissed with prejudice, (Adv.Pro.Dkt.# 19), and YES' objection to that claim was withdrawn (Dkt.# 201). YES does not intend to pay itself on that assigned claim at Closing.

IV. Plan Modification

The treatment of Class 3 is to be modified as follows:

The treatment of the lien claim of Tri-County Electric Company of Washtenaw County ("Tri-County"), was asserted in the sum of \$335,124.00. It is to be paid to the holder thereof in the sum of \$160,000.00 on the later of (i) the Effective Date, (ii) ten (10) days after the entry of a Final Order determining the Allowed Claim of Tri-County, or (iii) such date as YES may elect.

The treatment of all other holders of Class 3 claims shall remain as provided in the Plan.

V. Approval of Modification

Tri-County has approved of this modification. This modification does not adversely change the treatment of the claim of any creditor or the interest of any equity security holder who has not accepted in writing the modification.

PLAN PROPONENT

July 20, 2022

YOUR ENTERPRISE SOLUTIONS, LLC
A Michigan Limited Liability Company

By: /s/ Elizabeth Haeussler

Elizabeth Haeussler

Its: Manager

July 20, 2022

FINKEL WHITEFIELD FELDMAN

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